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265 FRANKLIN STREET
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(617) 951-1400

(617) 951-0586

January 21, 2005

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station – 2<sup>nd</sup> Floor
Boston, Massachusetts 02110

Re: D.T.E. 03-88A, D.T.E. 03-88B, D.T.E. 03-88C, D.T.E. 03-88D, D.T.E. 03-88E and D.T.E. 03-88F, Costs To Be Included in Default Service Rates

Dear Secretary Cottrell:

Enclosed for filing are: (1) the Joint Motion for Approval of Settlement Agreement; and (2) the Settlement Agreement entered into by Boston Edison Company, Cambridge Electric Light Company, Commonwealth Electric Company, Fitchburg Gas and Electric Light Company, Massachusetts Electric Company, Nantucket Electric Company, Western Massachusetts Electric Company, the Attorney General and Associated Industries of Massachusetts in the above-referenced matters. Also enclosed is a Certificate of Service.

The Settlement Agreement is intended to resolve all issues in these cases and to result in the termination of D.T.E. 03-88A through D.T.E. 03-88F. As described in the Settlement Agreement, it shall be deemed withdrawn if not approved in its entirety by the Department by February 18, 2005.

In addition, I am authorized to represent that Select Energy, Inc. supports the Settlement Agreement and that the Division of Energy Resources, the Low-Income Weatherization and Fuel Assistance Network and Massachusetts Community Action Program Directors Association, Inc. have no objection to the Settlement Agreement.

Letter to Secretary Cottrell January 21, 2005 Page 2

Thank you for your attention to this matter.

Very truly yours,

Robert N. Werlin

cc: John Geary, Hearing Officer

Service Lists

# COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

	)	
Boston Edison Company	)	D.T.E. 03-88A
Cambridge Electric Light Company	)	D.T.E. 03-88B
Commonwealth Electric Company	)	D.T.E. 03-88C
Fitchburg Gas and Electric Light Company	)	D.T.E. 03-88D
Massachusetts Electric Company and	)	
Nantucket Electric Company	)	D.T.E. 03-88E
Western Massachusetts Electric Company	)	D.T.E. 03-88F
• •	j	

#### **CERTIFICATE OF SERVICE**

I certify that I have this day served the foregoing document upon the Department of Telecommunications and parties of record in accordance with the requirements of 220 C.M.R. 1.05 (Department's Rules of Practice and Procedures).

Robert N. Werlin, Esq.

Keegan, Werlin & Pabian, LLP

265 Franklin Street

Boston, Massachusetts 02110

(617) 951-1400

Dated: January 21, 2005

# COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Boston Edison Company	)	D.T.E. 03-88A
Cambridge Electric Light Company	)	D.T.E. 03-88B
Commonwealth Electric Company	)	D.T.E. 03-88C
Fitchburg Gas and Electric Light Company	)	D.T.E. 03-88D
Massachusetts Electric Company and	)	
Nantucket Electric Company	)	D.T.E. 03-88E
Western Massachusetts Electric Company	)	D.T.E. 03-88F
	)	

#### JOINT MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT

Boston Edison Company, Cambridge Electric Light Company, Commonwealth Electric Company, Fitchburg Gas and Electric Light Company d/b/a Unitil, Massachusetts Electric Company and Nantucket Electric Company, Western Massachusetts Electric Company, the Attorney General of the Commonwealth and Associated Industries of Massachusetts (collectively, the "Settling Parties") jointly move, pursuant to 220 C.M.R. § 1.04(5), for Department of Telecommunications and Energy (the "Department") approval of the Settlement Agreement (the "Settlement Agreement") filed herewith. This Settlement Agreement is offered with the intent of terminating D.T.E. 03-88A through D.T.E. 03-88F and resolving all issues relating thereto.

This Settlement Agreement is conditioned on approval in its entirety by the Department and on the further condition that, if the Department does not approve the Settlement Agreement in its entirety by February 18, 2005, it shall be deemed withdrawn.

#### WHEREFORE, the Settling Parties request that the Department grant this Joint

Motion for Approval of Settlement Agreement on or before February 18, 2005.

Respectfully Submitted,

BOSTON EDISON COMPANY
CAMBRIDGE ELECTRIC
LIGHT COMPANY and
COMMONWEALTH ELECTRIC
COMPANY
d/b/a NSTAR Electric

FITCHBURG GAS AND ELECTRIC LIGHT COMPANY d/b/a UNITIL

By their attorney,

Robert N. Werlin

Keegan, Werlin & Pabian, LLP

265 Franklin Street Boston, MA 02110 By its attorney,

Gary Epler

Senior Regulatory Counsel Unitil Service Corporation 6 Liberty Lane West Hampton, NH 03842

MASSACHUSETTS ELECTRIC COMPANY and NANTUCKET ELECTRIC COMPANY WESTERN MASSACHUSETTS ELECTRIC COMPANY

By their attorney,

luy 6. Kg.

Amy G. Rabinowitz 25 Research Drive

Westboro, MA 01582

By its attorney,

Stephen Klionsky

100 Summer Street, 23rd Floor

Boston, MA 02110

## ATTORNEY GENERAL OF MASSACHUSETTS

By his attorneys,

Joseph Rogers
Colleen McConnell

Assistant Attorneys General Regulated Industries Division One Ashburton Place

One Ashburton Place Boston, MA 02108

Dated: January 21, 2005

## ASSOCIATED INDUSTRIES OF MASSACHUSETTS

By its attorney,

Robert Ruddock
222 Berkeley Street

P.O. Box 763

Boston, MA 02117-0763

#### COMMONWEALTH OF MASSACHUSETTS

#### DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

	)	
Boston Edison Company	)	D.T.E. 03-88A
Cambridge Electric Light Company	)	D.T.E. 03-88B
Commonwealth Electric Company	)	D.T.E. 03-88C
Fitchburg Gas and Electric Light Company	)	D.T.E. 03-88D
Massachusetts Electric Company and	)	
Nantucket Electric Company	)	D.T.E. 03-88E
Western Massachusetts Electric Company	)	D.T.E. 03-88F
	)	

#### SETTLEMENT AGREEMENT

Boston Edison Company ("Boston Edison"), Cambridge Electric Light Company ("Cambridge"), Commonwealth Electric Company ("Commonwealth") (together, "NSTAR Electric"), Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil"), Massachusetts Electric Company and Nantucket Electric Company (together, "MECo") and Western Massachusetts Electric Company ("WMECo") (individually, each a "Distribution Company" and collectively, the "Distribution Companies"), the Attorney General of the Commonwealth (the "Attorney General") and Associated Industries of Massachusetts (collectively, the "Settling Parties") agree, subject to the approval by the Department of Telecommunications and Energy (the "Department"), to resolve all issues relating to these proceedings.

#### **ARTICLE 1**

#### **INTRODUCTION**

1.1 On November 17, 2003, the Department issued an order requiring certain types of costs now included in base distribution rates to be included in Default Service, as

- defined in G.L. c. 164, § 1B(d)) and requiring that each of the Distribution Companies submit filings to comply with that order.
- 1.2 On January 20, 2004, NSTAR Electric submitted its compliance filing, including the prefiled written testimony of Henry C. LaMontagne and supporting documentation.
- 1.3 On January 20, 2004, Unitil submitted its compliance filing, including the prefiled written testimony of Karen M. Asbury and supporting documentation.
- 1.4 On January 20, 2004, MECo submitted its compliance filing, including the prefiled written testimony of Theresa M. Burns and Michael J. Hager and supporting documentation.
- 1.5 On January 20, 2004, WMECo submitted its compliance filing, including the prefiled written testimony of Edward A. Davis and supporting documentation.
- 1.6 The Department, the Attorney General and Constellation conducted discovery in these proceedings.
- 1.7 This Settlement Agreement is offered with the intent of terminating D.T.E. 03-88A through D.T.E. 03-88F and resolving all issues relating thereto. This Settlement Agreement is not offered to establish the position of any party with respect to the method of unbundling costs and rates, the ratemaking treatment of bad debt or any other cost, including administrative costs, the method of determining and allocating overhead costs and rates, and the Settling Parties agree that this Settlement Agreement will have not precedential effect on those ratemaking issues.

1.8 This Settlement Agreement resolves all issues relating to these proceedings, as follows:

#### **ARTICLE 2**

#### TERMS OF AGREEMENT

- 2.1 The Settling Parties agree that any transfer of cost recovery from base distribution rates to Default Service rates be revenue neutral to each of the Distribution Companies. Except for Unitil, no additional category or categories of costs are to be collected and no category or categories of costs are to be eliminated when the recovery of such costs are transferred from base distribution rates into Default Service rates. Unitil shall collect bad debt and working capital in Default Service, which has already been removed from base distribution rates.
- 2.2 The Settling Parties agree that the recovery of costs so transferred shall be collected in Default Service rates, but the Settling Parties agree that for accounting, ratemaking and all other purposes they shall be treated as base distribution costs and revenue.
- 2.3 The Settling Parties agree that each of the Distribution Companies shall increase its Default Service rates and reduce its distribution rates to implement the transfer of the recovery of costs effective on the first date after March 1, 2005 on which said Distribution Company's Default Service rates are changed for all classes of customers.
- 2.4 The Settling Parties agree that the amount of the transfer of cost recovery shall be as set forth in the Settlement Appendices, which compute: (a) the amount of wholesale and direct retail costs, as defined by the Department's November 17,

2003 order, that are to be collected in Default Service rates; (b) the per-kilowatthour ("kWh") increase in Default Service rates designed to recover that level of costs; and (c) the corresponding decrease in distribution rates to remove that level of costs from distribution rates. Such costs shall be fixed until the next general distribution rate case in which a Distribution Company proposes or the Department directs the removal of Default Service-related costs, or unless otherwise proposed to be adjusted by the Distribution Company, subject to approval by the Department; except that for Unitil, bad debt and working capital shall change as provided by it Default Service tariff, M.D.T.E. No. 114, as amended from time to time. However, at such time that the migration of a Distribution Company's customers from Default Service to competitive supply increases to a significant level as compared to the level at the time the rate adjustments included in the Settlement Appendices are implemented, the Settling Parties agree that the rate adjustments included in the Settlement Appendices may be adjusted to reflect the decline in Default Service customers.

2.5 The Settling Parties agree that no incremental administrative wholesale costs or incremental administrative direct retail costs are included in the costs shown in the Settlement Appendices, although the Department has stated that such costs may be included (see, Order Opening Investigation, D.T.E. 03-88 (November 17, 2003), pp. 2-3). The Settling Parties further agree that should any law, rule, regulation, Department order or Department directive revise the procedure for the

The projection of Default Service sales is based on the sales volume to existing customers taking Default Service, plus the sales volume to existing customers presently taking Standard Offer Service. Because Standard Offer Service will end on February 28, 2005, it is assumed that all such customers will be transferred to Default Service.

procurement of Default Service or its successor service in such a way as to substantially increase administrative wholesale costs and/or direct retail costs, this Settlement shall not preclude any party from petitioning the Department for recovery of any or all such additional costs.

- 2.6 The Settling Parties agree that to ensure that the transfer of cost recovery is revenue neutral to each of the Distribution Companies, it is necessary and appropriate to perform an annual reconciliation of revenue recovery. Said annual reconciliation will be performed to reconcile any differences in the sales volumes from the volumes projected when the adjustment factors were implemented for the year being reconciled. The Settling Parties agree that there will be no reconciliation to the level of costs actually incurred, except as discussed in Section 2.4 regarding significant increases in migration to competitive supply, but rather the reconciliation will ensure only that the recovery of the costs to be transferred (as computed for each of the Distribution Companies in the Settlement Appendices) is collected in rates for Default Service and that the corresponding level of revenue reductions are implemented through lower distribution rates. For Unitil, the reconciliation shall reflect bad debt and working capital calculated in accordance with its Default Service tariff.
- 2.7 Each of the Distribution Companies shall annually propose adjustments to the Default Service rates and distribution rates to adjust for any over- or undercollection computed in the annual reconciliation. Any such over- or undercollection shall be deferred for later recovery upon review and approval by the Department. Carrying charges for any over- or undercollection will be

computed at the Distribution Company's applicable rate reflected in its Default Service recovery mechanism. A Distribution Company may seek an interim change in the Default Service rate or distribution rate if significant over- or undercollections occur or are expected to occur.

#### **ARTICLE 3**

#### **CONDITIONS**

- 3.1 This Settlement Agreement shall not be deemed in any respect to constitute an admission by any party that any allegation or contention in this proceeding is true or false. Except as specified in this Settlement Agreement, the entry of an order by the Department approving the Settlement Agreement shall not in any respect constitute a determination by the Department as to the merits of any other issue raised in this proceeding.
- 3.2 The making of this Settlement Agreement establishes no principles and shall not be deemed to foreclose any party from making any contention in any future proceeding or investigation, except as to those issues and proceedings that are stated in this Settlement Agreement as being resolved and terminated by approval of this Settlement Agreement.
- 3.3 This Settlement Agreement is the product of settlement negotiations. The Settling Parties agree that the content of those negotiations (including any workpapers or documents produced in connection with the negotiations) are confidential, that all offers of settlement are without prejudice to the position of any party or participant presenting such offer or participating in such discussion, and that they will not use the content of those negotiations in any manner in these or other

- proceedings involving one or more of the parties to this Settlement Agreement, or otherwise.
- 3.4 The provisions of this Settlement Agreement are not severable. This Settlement Agreement is conditioned on its approval in full by the Department.
- 3.5 If the Department does not approve the Settlement Agreement in its entirety by February 18, 2005, it shall be deemed to be withdrawn and shall not constitute a part of the record in any proceeding or used for any other purpose.
- 3.6 The Department shall have continuing jurisdiction to enforce the terms of this Settlement Agreement.

The signatories listed below represent that they are authorized on behalf of their principals to enter into this Settlement Agreement.

BOSTON EDISON COMPANY
CAMBRIDGE ELECTRIC
LIGHT COMPANY and
COMMONWEALTH ELECTRIC
COMPANY
d/b/a NSTAR Electric

FITCHBURG GAS AND ELECTRIC LIGHT COMPANY d/b/a UNITIL

By their attorney,

Robert N. Werlin

Keegan, Werlin & Pabian, LLP

265 Franklin Street Boston, MA 02110 By its attorney,

Gary Epler

Senior Regulatory Counsel Unitil Service Corporation

6 Liberty Lane West Hampton, NH 03842

#### MASSACHUSETTS ELECTRIC **COMPANY** and NANTUCKET ELECTRIC **COMPANY**

By their attorney,

Amy G. Rabinowitz 25 Research Drive Westboro, MA 01582

#### ATTORNEY GENERAL OF **MASSACHUSETTS**

By his attorneys,

Joseph Rogers Colleen McConnell Assistant Attorneys General Regulated Industries Division One Ashburton Place Boston, MA 02108

Dated: January 21, 2005

#### WESTERN MASSACHUSETTS **ELECTRIC COMPANY**

By its attorney,

Stephen Klionsky 100 Summer Street, 23rd Floor

Boston, MA 02110

#### ASSOCIATED INDUSTRIES OF **MASSACHUSETTS**

By its attorney,

Robert Ruddock 222 Berkeley Street

P.O. Box 763

Boston, MA 02117-0763

## SETTLEMENT APPENDICES

# Boston Edison Company Cambridge Electric Light Company Commonwealth Electric Company d/b/a NSTAR Electric

#### **NSTAR ELECTRIC**

D.T.E. 03-88A, D.T.E. 03-88B, D.T.E. 03-88C Year 2003

#### Wholesale Costs to be included with Default Service (1)

Description		<u>Total</u>	Во	ston Edison	Commonwealth			<u>Cambridge</u>					
Solicitation	\$	132,470	\$	95,116	\$	25,599	\$	11,756					
<u>Administration</u>	\$	12,244	\$	8,792	\$	2,366	\$	1,087					
Total	\$	144,715	\$	103,907	\$	27,965	\$	12,842					
Direct Retail Costs to be included with Default Service													
Description		Total	Rο	ston Edison	Com	monwealth		Cambridge					

Description Bad Debt(2) Cust Communications(3) RPS Costs(1) Total	\$ \$ \$	Total 7,925,131 94,922 3,597 8,023,650	\$ \$ \$ \$	6,406,258 61,767 2,583 6,470,608	C  \$ \$ \$ \$ \$	1,236,175 28,293 695 1,265,163	\$ \$ \$	<u>Cambridge</u> 282,698 4,862 319 287,878
Total Costs	\$	8,168,364	\$	6,574,515	\$	1,293,128	\$	300,721
DS & SO - mWh DS - Adjustment	\$	16,472,430.7 <b>0.00050</b>	\$	11,782,693.4 <b>0.00056</b>	\$	3,219,251 <b>0.00040</b>	\$	1,470,487 <b>0.00020</b>
Total - mWh  Distribution Adj.	\$	20,807,957.5 <b>0.00039</b>	\$	14,988,130.4 <b>0.00044</b>	\$	4,171,393.2 <b>0.00031</b>	\$	1,648,433.9 <b>0.00018</b>
Allocation Factors DS & SO Revenue DS & SO Pamphlets	\$	899,448,572 4,764,000	\$	645,817,407 3,100,000	\$	173,812,918 1,420,000	\$	79,818,247 244,000

<sup>(1)</sup> NSTAR total costs allocated to individual company in proportion to company DS revenue

<sup>(2)</sup> Reflects the sum of the net write-offs for existing Default and Standard Offer customers. See Exhibit NSTAR-HCL-2.

<sup>(3)</sup> Costs allocated in proportion to # of pamplets distributed.

#### **NSTAR ELECTRIC**

D.T.E. 03-88A, D.T.E. 03-88B, D.T.E. 03-88C Year 2003

#### **Boston Edison - Bad Debt Allocation**

Service Type	<u>mWh</u>	Percent	<u>Revenue</u>		<u>Revenue</u>		Percent		Percent		ad Debt(1)	\$/	<u>kWh</u>
Default	4,613,960.1	30.8%	\$	269,524,659	17.0%	\$	2,673,580	\$ 0.	00058				
Standard Offer	7,168,733.3	47.8%	\$	376,292,748	23.8%	\$	3,732,678	\$ 0.	00052				
Competitive	3,205,437.0	21.4%	\$	-	0.0%	\$	-	\$	-				
<u>Delivery</u>		0.0%	\$	936,376,456	<u>59.2%</u>	\$	9,288,492						
Total	14,988,130.4	100.0%	\$ 1	,582,193,863	100.0%	\$	15,694,750	\$ 0.	00105				

#### **Commonwealth Electric - Bad Debt Allocation**

Service Type	<u>mWh</u>	Percent	<u>Revenue</u>	Percent	В	ad Debt(1)	\$/	kWh_
Default	660,147.8	15.8%	\$ 36,449,423	7.7%	\$	259,232	\$ 0.0	00039
Standard Offer	2,559,102.8	61.3%	\$ 137,363,495	29.1%	\$	976,943	\$ 0.0	00038
Competitive	952,142.6	22.8%	\$ -	0.0%	\$	-	\$	-
<u>Delivery</u>		0.0%	\$ 298,159,553	<u>63.2%</u>	\$	2,120,540		
Total	4,171,393.2	100.0%	\$ 471,972,471	100.0%	\$	3,356,715	\$ 0.0	08000

#### **Cambridge Electric - Bad Debt Allocation**

Service Type	<u>mWh</u>	Percent	<u>Revenue</u>		Percent		ad Debt(1)	\$/k	<u>Wh</u>
Default	499,342.9	30.3%	\$	27,813,561	19.1%	\$	98,509	\$ 0.0	0020
Standard Offer	971,143.8	58.9%	\$	52,004,686	35.8%	\$	184,188	\$ 0.0	0019
Competitive	177,947.2	10.8%	\$	-	0.0%	\$	-	\$	-
<u>Delivery</u>		0.0%	\$	65,576,464	<u>45.1%</u>	\$	232,256		
Total	1,648,433.9	100.0%	\$	145,394,711	100.0%	\$	514,954	\$ 0.0	0031

Note 1: Allocated to Default and Standard Offer Service in proportion to the ratio of DS or SOS revenue to total revenue.

#### **Energy Label Allocation**

Company	Qι	arterly Pamp	hlet Distribution			Allocated	
	March	June	September	December	Total	% of Total	Cost
BE-SOS	515,000	515,000	515,000	515,000	2,060,000	43.24%	\$ 41,045.20
BE-DS	260,000	260,000	260,000	260,000	1,040,000	21.83%	\$ 20,721.85
COM-SOS	305,000	305,000	305,000	305,000	1,220,000	25.61%	\$ 24,308.32
COM-DS	50,000	50,000	50,000	50,000	200,000	4.20%	\$ 3,984.97
CAM-SOS	35,000	35,000	35,000	35,000	140,000	2.94%	\$ 2,789.48
CAM-DS	26,000	26,000	26,000	26,000	104,000	2.18%	\$ 2,072.18
TOT	1,191,000	1,191,000	1,191,000	1,191,000	4,764,000	100.00%	\$ 94,922.00

#### **NSTAR ELECTRIC**

D.T.E. 03-88A, D.T.E. 03-88B, D.T.E. 03-88C Year 2003

	Solicitation	_	ontract <u>Review</u>	_	ontract gotiations	<u> </u>	Data <u>Services</u>	Re	egulatory	<u>Aı</u>	<u>nalysis</u>	<u>Total</u>
1	Average Labor Cost per Hour	\$	51.68	\$	54.62	\$	43.40	\$	54.62	\$	30.29	\$ 51.57
2	Annual Hours		412		360		20		180		72	1,044
3	Cost of Labor	\$	21,292	\$	19,663	\$	868	\$	9,832	\$	2,181	\$ 53,836
4	Labor Overheads @ 74%	\$	15,75 <u>6</u>	\$	14,55 <u>1</u>	\$	642	\$	7,275	\$	1,614	\$ 39,839
5	Sub-total	\$	37,048	\$	34,214	\$	1,510	\$	17,107	\$	3,795	\$ 93,674
6	Other Costs (Legal)											\$ 38,796
7	Total											\$ 132,470
8												
9		_	ontract		Data							
10	<u>Administration</u>	4	<u>Admin</u>	<u>S</u>	ervices		<u>Billing</u>		<u>Total</u>			
11												
12	Average Labor Cost per Hour	\$	34.08	\$	43.40	\$	43.40	\$	36.09			
13	Annual Hours		153		20		22		195			
14	Cost of Labor	\$	5,214	\$	868	\$	955	\$	7,037			
15	Labor Overheads @ 74%	\$	3,859	\$	642	\$	707	\$	5,207			
16	Total	\$	9,073	\$	1,510	\$	1,661	\$	12,244			
17												
18	<u>RPS</u>	<u>Adr</u>	<u>nin</u>									
19												
20	Average Labor Cost per Hour	\$	51.68									
21	Annual Hours		40									
22	Cost of Labor	\$	2,067									
23	Labor Overheads @ 74%	\$	1,530									
24	Total	\$	3,597									

Note: Costs are based upon year 2003 experience adjusted to reflect 4 solicitations in 2004 and beyond.

# Fitchburg Gas and Electric Light Company d/b/a Unitil

#### Computation of Adder to Default Service and Distribution Base Rate Adjustment

					Costs to be	· · · · · · · · · · · · · · · · · · ·	
					transferred		
		Costs to					
		be			from		
		included in	kWh Used		Distribution		
		Default	by Default		Base Rates to		
		Service	Service	Adder to	Default	kWh Used by	
		(annual	Customers	Default	Service	All Customers	Base Rate
		cost)	(1)	Service	(annual cost)	(1)	Decrease
		3337	\-\\-\-\-\-\-\-\-\-\-\-\-\-\-\-\-\-\-\				
	Wholesale:						
	Design and implementation of competitive						
	bidding process, including evaluation of						
					N/	l	
	supplier bids and contract negotiations, and						
	ongoing administration and execution of						
	contracts with suppliers, including						
	accounting activities necessary to track				A	o	***
1	payments made to suppliers (Page 2)	<u>\$17,278</u>	<u>336,750,644</u>	<u>\$0.00005</u>	<u>\$17,278</u>	<u>538,079,916</u>	\$0.00003
	,						
2	Total Wholesale	\$17,278	336,750,644	\$0.00005	\$17,278	538,079,916	\$0.00003
	Retail:						
3	Unrecovered bad debt (Page 3) (2)	\$171,730	336,750,644	\$0.00051	excluded from	base rates in D.T	.E. 02-24/25
	Compliance with DTE's regulatory				A Company		
	requirements including required						
	communication with DS customers pursuant	:					
4	to 220 CMR 11.06 (Page 4)	\$51,933	336,750,644	\$0.00015	\$51,933	538,079,916	\$0.00010
				į.			
	Compliance with MA Renewable Energy					1	
	Portfolio Standard, 225 CMR 14						
5	Total Labor and Overhead Cost (Page 5)	\$421	336,750,644	\$0.00000	\$421	538,079,916	\$0.00000
6	Other Related Direct Charges (Page 5)	\$202,050	<u>336,750,644</u>	\$0.00060	incremental co	st; not included i	n base rates
7	Total Retail	\$426,135	336,750,644	\$0.00127	\$52,355	538,079,916	\$0.00010
		` '	' '				
							ļ i
8	Total Wholesale and Retail	\$443,413	336,750,644	\$0.00132	\$69,633	538,079,916	\$0.00013
						•	·
9	Cost of working capital (2) (Page 6)	\$107,899	336,750,644	\$0.00032	excluded from	base rates in D.	r.E. 02-24/25
•	Cook of manning capital (2) (i ago o)	7.4.144					
10	Grand Total	\$551,312	336,750,644	\$0.00164	\$69,633	538,079,916	\$0.00013
.0		1 400 7,012		******	7.0,000		
	Less: MA Renewable Energy Portfolio						
11	Standard Direct Charges (3)	\$202,050	336,750,644	\$0.00060			
11	Standard Direct Charges (3)	<u>\$202,030</u>	330,730,044	<del>\$0.0000</del>			
	Adder to Default Service (not incl. Supply		1	1			
	Adder to Default Service (not incl. Supply						
	& MA Renewable Energy Portfolio	60.40.000	220 750 044	10000404			
<u> 12</u>	Standard Direct Charges)	\$349,262	336,750,644	<b>\$0.00104</b>			

#### Notes:

- (1) Based on estimate for January-December 2005. Default Service estimate also includes estimate of 2005 kWh sales projected for Standard Offer Service ("SOS"). Because all SOS customers will switch to Default Service on March 1, 2005, sales associated with SOS are included in this calculation.
- 2) Based on 2005 figures provided in Unitil's Annual Electric Reconciliation and Rate filing. Amounts for reconciliation shall reflect actual bad debt and working capital, calculated in accordance with Unitil's Default Service tariff, MDTE No. 114.
- 3) These costs are already included in FG&E's current default service price.

#### Wholesale Costs to be Included in Default Service

Design and implementation of competitive bidding process, including evaluation of supplier bids and contract negotiations, and ongoing administration and execution of contracts with suppliers, including accounting activities necessary to track payments made to suppliers.

Energy Services Department:  1 Average Cost of Labor per Hour  2 Estimated Annual Hours Required - Solicitation  3 Estimated Annual Hours Required - Administration  4 Total Estimated Annual Hours Required to Accomplish Task  5 Cost of Labor  6 Overhead  7 Total Labor and Overhead Cost	Total \$36.01 169 <u>56</u> 225 \$8,102 \$7,697 \$15.799	Notes 1 2
Regulatory Services Department:	\$0	
Accounts Payable Department:  1 Average Cost of Labor per Hour  2 Estimated Annual Hours Required to Accomplish Task  3 Cost of Labor  4 Overhead  5 Total Labor and Overhead Cost	\$17.09 <u>4.0</u> \$68 <u>\$65</u> <u>\$133</u>	2
Treasury Department:  1 Average Cost of Labor per Hour 2 Estimated Annual Hours Required to Accomplish Task 3 Cost of Labor 4 Overhead 5 Total Labor and Overhead Cost 6 Other Related Direct Charges (wire transfers) 7 Total Cost	\$29.95 14.0 \$419 \$398 \$818 \$528 \$1.346	2
Communications Department:	\$0	
Information Systems Department:	\$0	
TOTAL ANNUAL COST	<u>\$17.278</u>	

#### Notes:

- 1) Hourly wages for positions effective 2003.
- 2) Based on Unitil Service Corp overhead rate of 95% effective January 2003-December 2003.

#### Retail Costs to be Included in Default Service

Monthly Electric Write Offs (Gross) - Electric Division Calendar Year 2003 Computation of Bad Debt Allocation Factor

			Standard Offer						
	Delivery	<b>Default Service</b>	Service						
<u>Month</u>	<b>Component</b>	<b>Component</b>	<b>Component</b>	<u>Total</u>					
Jan-03	\$15,631	\$8,580	\$3,945	\$28,156					
Feb-03	\$17,638	<b>\$9,369</b>	\$4,705	\$31,712					
Mar-03	\$20,039	\$10,915	\$4,778	\$35,732					
Apr-03	\$22,240	\$15,107	\$2,710	\$40,057					
May-03	\$30,682	\$16,256	\$4,018	\$50,955					
Jun-03	\$21,473	\$12,335	\$4,378	\$38,187					
Jul-03	\$29,051	\$17,207	\$3,085	<b>\$49,343</b>					
Aug-03	\$34,154	\$21,063	\$3,763	\$58,981					
Sep-03	\$26,003	\$17,075	\$1,271	\$44,350					
Oct-03	\$19,964	\$12,565	\$1,733	\$34,262					
Nov-03	\$20,126	\$11,372	\$4,378	\$35,876					
Dec-03	<u>\$50,497</u>	<u>\$30,007</u>	<u>\$5,308</u>	<u>\$85,813</u>					
Total	\$307,499	\$181,852	\$44,073	\$533,423					
Percentage	57.65%	34.09%	8.26%	100.00%					
Bad Debt Expense from DTE 02-24/25 Bad Debt Allocation Factor 2005 Bad Debt Costs Allocated to Default Service			\$405,501 <u>42.35%</u> \$171,730	Tab D, Sch. MHC-7-8 (Electric) Standard Offer & Default Service					

Source: As filed in D.T.E. 04-108, Unitil's Annual Electric Reconciliation and Rate filing, dated November 24, 2004, Schedule KMA-3 Page 4 of 7 and Page 7 of 7.

#### Retail Costs to be Included in Default Service

Compliance with DTE's regulatory requirements including required communication with DS customers pursuant to 220 CMR 11.06.

	<u>Total</u>	<u>Notes</u>
Energy Services Department:  1 Average Cost of Labor per Hour	\$36.01	1
2 Estimated Annual Hours Required to Accomplish Task	20.0	'
3 Cost of Labor	\$720	
4 Overhead	\$684	2
5 Total Labor and Overhead Cost	\$1.404	_
Regulatory Services Department:		
1 Average Cost of Labor per Hour	\$34.80	1
2 Estimated Annual Hours Required to Accomplish Task:	<u>104.0</u>	1
3 Cost of Labor	\$3,619	1
4 Overhead	<u>\$3,438</u>	2
5 Total Labor and Overhead Cost	\$7,057	
6 Other Related Direct Charges (outside legal costs & miscellaneous)	<u>\$20,000</u>	
7 Total Cost	<u>\$27.057</u>	
Accounts Payable Department:	\$0	
Treasury Department:	\$0	
Communications Department:		
1 Average Cost of Labor per Hour	\$30.77	1
2 Estimated Annual Hours Required to Accomplish Task	<u>96.0</u>	
3 Cost of Labor	\$2,954	
4 Overhead	<u>\$2,806</u>	2
5 Total Labor and Overhead Cost	\$5,760	
<ul> <li>Other Related Direct Charges (printing costs for disclosure label and default service rate pamphlet)</li> <li>Total Cost</li> </ul>	\$17,600 <u>\$23.360</u>	
Information Systems Department:		
1 Average Cost of Labor per Hour	\$28.55	1
2 Estimated Annual Hours Required to Accomplish Task	2.0	
3 Cost of Labor	\$57	
4 Overhead	<u>\$54</u>	2
5 Total Labor and Overhead Cost	\$111	
TOTAL ANNUAL COST	\$51.93 <u>3</u>	

#### Notes:

- 1) Hourly wages for positions effective 2003.
- 2) Based on Unitil Service Corp overhead rate of 95% effective January 2003-December 2003.

#### Retail Costs to be Included in Default Service

Compliance with MA Renewable Energy Portfolio Standard, 225 CMR 14

	<u>Total</u>	<u>Notes</u>
Energy Services Department:  1 Average Cost of Labor per Hour  2 Estimated Annual Hours Required to Accomplish Task  3 Cost of Labor	\$36.01 <u>6</u> \$216	1
4 Overhead	<u>\$205</u> \$421	2
5 Total Labor and Overhead Cost 6 Other Related Direct Charges (estimated cost of renewable energy certificates) 7 Total Cost	\$202,050 \$202,472	3
Regulatory Services Department:	\$0	
Accounts Payable Department:	\$0	
Treasury Department:	\$0	
Communications Department:	\$0	
Information Systems Department:	\$0	
TOTAL ANNUAL COST	<u>\$202.472</u>	

#### Notes:

- 1) Hourly wages for positions effective 2003.
- 2) Based on Unitil Service Corp overhead rate of 95% effective January 2003-December 2003.
- 3) Estimate of cost of Renewable Energy Certificate ("RECs") purchases. FG&E currently includes RECs cost in Default Service price. Actual costs are fully reconciled. Alternative Compliance payments would also be included here. Assumes Default Service load \* 1.5% \* \$40/MWH

#### Calculation of Cash Working Capital for Default Service (1)

	Jan-05 Estimate	Feb-05 Estimate	Mar-05 Estimate	Apr-05 Estimate	May-05 Estimate	Jun-05 Estimate
1 Default Service Supplier Costs	\$1,918,701	\$1,833,280	\$2,255,706	\$2,203,930	\$1,974,512	\$2,210,077
2 Number of Days of Lag / 365 (13.49/365)	3.70%	3.70%	3.70%	3.70%	3.70%	3.70%
3 Working Capital Requirement (L.1 * L.2)	\$70,913	\$67,756	\$83,368	\$81,455	\$72,976	\$81,682
4 Cost of Equity	4.25%	4.25%	4.25%	4.25%	4.25%	4.25%
5 Cost of Debt	4.25%	4.25%	4.25%	4.25%	4.25%	4.25%
6 Effective Tax Rate	38.03%	38.03%	38.03%	38.03%	38.03%	38.03%
7 Tax Adjusted Cost of Capital (L.5 + (L.4/(1-L.6)))	11.11%	11.11%	11.11%	11.11%	11.11%	11.11%
8 Cost of Working Capital (L.3 * L.7)	\$7,877	\$7,526	\$9,261	\$9,048	\$8,106	\$9,073

	Jul-05 Estimate	Aug-05 Estimate	Sep-05 Estimate	Oct-05 Estimate	Nov-05 Estimate	Dec-05 Estimate	Total Jan-Dec 05
1 Default Service Supplier Costs	\$2,494,304	\$2,453,460	\$2,334,324	\$2,052,940	\$2,090,766	\$2,459,873	\$26,281,873
2 Number of Days of Lag / 365 (13.49/365)	3.70%	3.70%	3.70%	3.70%	3.70%		
3 Working Capital Requirement (L.1 * L.2)	\$92,187	\$90,677	\$86,274	\$75,874	\$77,272	\$90,914	\$971,349
4 Cost of Equity	4.25%	4.25%	4.25%	4.25%	4.25%	4.25%	
5 Cost of Debt	4.25%	4.25%	4.25%	4.25%	4.25%	4.25%	
6 Effective Tax Rate	38.03%	38.03%	38.03%	38.03%	38.03%	38.03%	
7 Tax Adjusted Cost of Capital (L.5 + (L.4/(1-L.6)))	11.11%	11.11%	11.11%	11.11%	11.11%	11.11%	,
8 Cost of Working Capital (L.3 * L.7)	\$10,240	\$10,073	\$9,583	\$8,428	\$8,584	\$10,099	\$107,899

Line 1: Sum of Line 1 from Schedule KMA-2 Page 6 of 8 and Line 1 from Schedule KMA-3 Page 5 of 7 of Unitil's November 24, 2004 Annual Electric Reconcilation Filing in D.T.E. 04-108.

Line 2: Number of Days of Lag as calculated in the Company's Lead/Lag Study, Schedule MHC-7 in DTE 02-84. Revised in Exhibit FG&E-MHC-2.

Line 4: DTE 02-24/25 December 2, 2002 Order.

Line 5: DTE 02-24/25 December 2, 2002 Order.

Line 6: 2004 Federal and State combined tax rate.

(1) January and February 2005 include working capital currently related to Standard Offer Service ("SOS"). Because all SOS customers will switch to Default Service on March 1, 2005, the working capital associated with SOS was included in this calculation.

## Massachusetts Electric Company Nantucket Electric Company

Massachusetts Electric Company Nantucket Electric Company DTE 03-88E

Appendix Page 1 of 2

#### Massachusetts Electric Company Nantucket Electric Company Calculation of Adjustment to Rates

				_		Industrial			
		<u>Total</u>	Residential	Commercial	<u>G-2</u>	<u>G-3</u>	<u>Total</u>		
Section 1	: Calculation of Credit to Distribution Rates								
(1)	Total Default Service Costs	\$7,915,060	\$6,011,319	\$580,252	\$661,744	\$661,744	\$1,323,489		
(2)	Distribution-Related kWh Deliveries for Credit Calculation	21,843,887,663	8,574,637,710	2,153,180,643	3,031,133,446	3,614,331,984			
(3)	Distribution Credit per kWh (Total)	(\$0.00036)	(\$0.00070)	(\$0.00026)	(\$0.00021)	(\$0.00018)			
(1) (2) (3)	Section 3, Line (1)								
Section 2	: Calculation of Surcharge to Default Service Rates								
(1)	Total Default Service Costs	\$7,915,060	\$6,011,319	\$580,252			\$1,323,489		
(2)	Total Commodity kWh Deliveries for Adder Calculation	17,301,822,368	8,503,511,411	1,929,269,047			6,869,041,910		
(3)	Default Service Surcharge per kWh	\$0.00045	\$0.00070	\$0.00030			\$0.00019		
(1) (2) (3)	Page 2, Section 4, Line (11) Section 3, Line (2) Line (1) ÷ Line (2), truncated after 5 decimal places								
Section 3	: kWh Data for the Period January 2003 through December 2003								
(1)	Total Company kWh Deliveries On Peak kWh Deliveries For Rate G-3	21,843,887,663	8,574,637,710	2,153,180,643	3,031,133,446	8,084,935,864 3,614,331,984	11,116,069,310		
(2) (3) (4)	Default Service kWh Deliveries Standard Offer kWh Deliveries Total Commodity kWh Deliveries	4,509,053,531 12,792,768,837 17,301,822,368	2,127,459,434 6,376,051,977 8,503,511,411	746,096,422 1,183,172,625 1,929,269,047	675,783,011 1,825,486,000 2,501,269,011	959,714,664 3,408,058,235 4,367,772,899	1,635,497,675 5,233,544,235 6,869,041,910		

Source: Company billing records

Massachusetts Electric Company Nantucket Electric Company DTE 03-88E Appendix Page 2 of 2

#### Massachusetts Electric Company Nantucket Electric Company Calculation of Adjustment to Rates

						Industrial	
C4 1	Definite Control	<u>Total</u>	Residential	Commercial	<u>G-2</u>	<u>G-3</u>	<u>Total</u>
Section 1	: Default Service Costs						
	Wholesale Costs:						
(1)	Procurement	\$57,995	\$19,332	\$19,332	\$9,666	\$9,666	\$19,332
(2)	Ongoing Administration	\$9,231	\$3,077	<u>\$3,077</u>	<u>\$1,538</u>	\$1,538	\$3,077
(3)	Total Wholesale Costs	\$67,226	\$22,409	\$22,409	\$11,204	\$11,204	\$22,409
	Direct Retail:						
(4)	Customer Communication and Rate Change Processing	\$18,501	\$6,167	\$6,167	\$3,084	\$3,084	\$6,167
(5)	Environmental Disclosure Label	\$11,540	\$3,847	\$3,847	\$1,923	\$1,923	\$3,847
(6)	RPS Compliance Costs	\$6,931	\$2,310	\$2,310	\$1,155	\$1,155	\$2,310
(7)	Bad Debt Expense	\$7,810,862	\$5,976,586	<u>\$545,520</u>	\$399,318	\$889,438	<u>\$1,288,756</u>
(8)	Total Direct Retail Costs	\$7,847,834	\$5,988,910	\$557,844	\$405,480	\$895,600	\$1,301,080
(9)	Total Default Service Costs	\$7,915,060	\$6,011,319	\$580,252	\$416,684	\$906,805	\$1,323,489

<sup>(1)</sup> January 20, 2004 Default Service Cost Recovery Filing, DTE 03-88E, Exhibit MJH-1; allocated equally to residential, commercial and industrial customer classes

<sup>(2)</sup> January 20, 2004 Default Service Cost Recovery Filing, DTE 03-88E, Exhibit MJH-1; allocated equally to residential, commercial and industrial customer classes

<sup>(3)</sup> Line (1) + Line (2)

<sup>(4)</sup> January 20, 2004 Default Service Cost Recovery Filing, DTE 03-88E, Exhibit TMB-2; allocated equally to residential, commercial and industrial customer classes

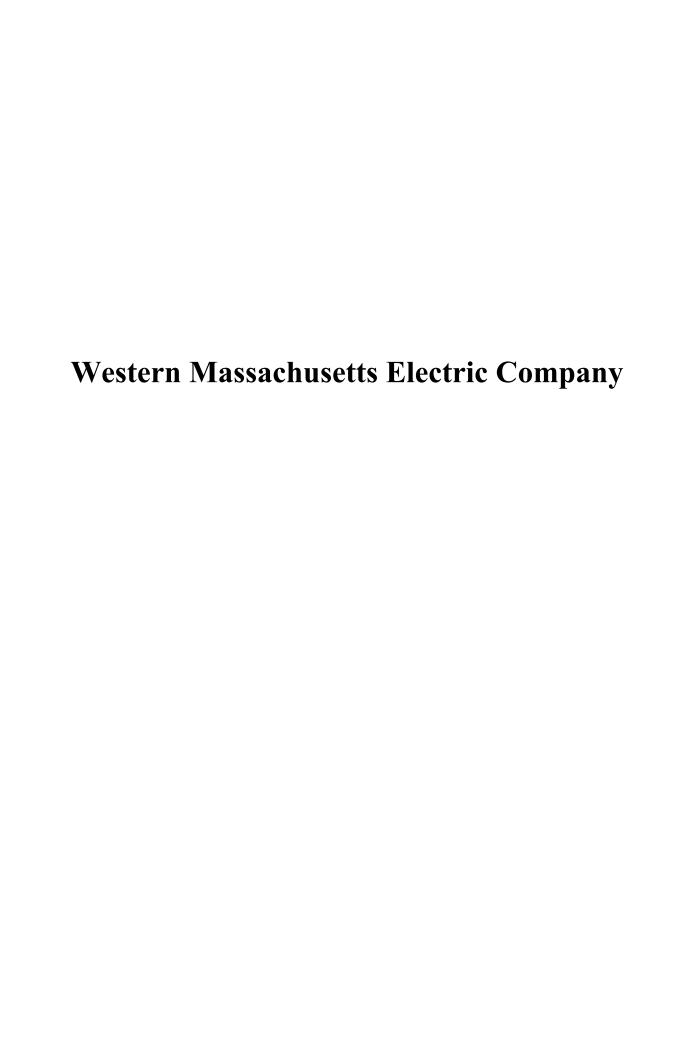
<sup>(5)</sup> January 20, 2004 Default Service Cost Recovery Filing, DTE 03-88E, Exhibit MJH-2; allocated equally to residential, commercial and industrial customer classes

<sup>(6)</sup> January 20, 2004 Default Service Cost Recovery Filing, DTE 03-88E, Exhibit MJH-3; allocated equally to residential, commercial and industrial customer classes

<sup>(7)</sup> January 20, 2004 Default Service Cost Recovery Filing, DTE 03-88E, updated to include comparable data related to Standard Offer bad debt expense

<sup>(8)</sup> Sum of Lines (4) through (7)

<sup>(9)</sup> Line (3) + Line (8)



#### Workpaper Reference

#### Wholesale Costs to be included with Default Service

Solicitation	\$100,812	Workpaper 2, line 25
Administration	6,771	Workpaper 2, line 21
Consultant	56,000	Workpaper 2, line 29
Legal	2,500	Workpaper 2, line 28
Total	\$166,083	

#### Direct Retail Costs to be included with Default Service

Bad Debt	\$1,845,638	Workpaper 1, line 19
Billing/IT	10,200	Workpaper 2, line 15
Regulatory	1,560	Workpaper 2, line 37
Legal	5,000	Workpaper 2, line 30
Communications	14,447	Workpaper 2, line 9
Total	\$1,876,845	

**Total Default Service Costs** \$2,042,928

#### **Adjustment to Distribution Rates**

Distribution Sales \* 4,014,226 MWH Average Adjustment Rate (\$0.00051) / kWh

#### **Adjustment to Default Service Rates**

Default Service Sales \* 3,436,656 MWH Average Adjustment Rate \$0.00059 / kWh

<sup>\*</sup> Source: 2003 Billed Sales.

1
2
3
4
5

#### Western Massachusetts Electric Company Bad Debt Expense- 2003

9														
10	Service Type	<u>Jan</u>	Feb	Mar	<u>Apr</u>	May	<u>Jun</u>	<u>Jul</u>	Aug	Sep	Oct	Nov	Dec	Total
11	Default Fixed	\$109,009	\$66,473	\$44,763	\$17,497	\$105,168	\$59,875	\$139,817	\$32,982	\$108,982	\$108,032	\$40,585	\$109,351	\$942,535
12	Default Variable	116	603	1,022	117	662		2,160	235	128	331		133	5,507
13	Subtotal	\$109,125	\$67,076	\$45,785	\$17,614	\$105,830	\$59,875	\$141,977	\$33,217	\$109,110	\$108,363	\$40,585	\$109,483	\$948,041
14														
15														
16														
17	Standard Offer	66,936	31,091	28,670	32,815	69,027	35,594	73,571	223,342	120,224	100,150	40,031	76,147	897,597
18	<u>Default</u>	109,125	67,076	45,785	17,614	105,830	59,875	141,977	33,217	109,110	108,363	40,585	109,483	948,041
19	Total	\$ 176,060	\$ 98,167	\$ 74,456	\$ 50,429	\$ 174,857	\$ 95,469	\$ 215,548	\$ 256,559	\$ 229,334	\$ 208,513	\$ 80,617	\$ 185,630	\$ 1,845,638

#### Estimated Wholesale and Retail Default Service Costs \*

	(A)	(B)	(C)	(D)	(E)	(F)
1	<u>Title/Grade</u>	<u>Activity</u>	<u>Hours</u>	Labor Rate Including <u>Overhead</u>	Wholesale Cost	Retail Cost
2	Communications/Website					
4	1 - Manager	Design	2	\$43.01		\$86
5	1 - Graphic Designer	Design	20	\$50.00		1,000
6	Printing cost	Outside Service		40000		11,721
7	1 - AE / Supplier Services	Determining website updates	4	\$35.00		140
8	1 - IT Web Master / Level 2	Updating / designing website	40	\$37.50		1,500
9	Sub-Total					\$14,447
10						
11	Billing Implementation/Review					
12	4 - Clerical / Accountants	Testing/Updating prices in CS	144	\$25.00		\$3,600
13	1 - IT Consultant	Creating test bills	60	\$100.00		6,000
14	1 - IT Operations	Moving rate tables into CS	12	\$50.00		<u>600</u>
15	Sub-Total					\$10,200
16	Contract Administration					
17 18	Contract Administration 1 - Analyst	Bill Payment	60	\$37.50	\$2,250	
19	2 - Analyst / 2 - Manager	Contract Review	65	\$62.50	4,063	
20	2 - Analyst / 2 - Manager 1 - Programmer	Contract Administration	10	\$45.83	4,003 458	
21	Sub-Total	Contract Administration	10	φ45.65	\$6,771	
22	Sub-Total				\$0,771	
23	Procurement/Contract Negotiations					
24	3 - Analyst / 2 - Manager / 1 - Legal	Administration / Execution / Solicitation	1364	\$73.90	\$100,812	
25	Sub-Total	Administration / Execution / Solicitation	1304	Ψ13.70	\$100,812	
26	Sub Total				Ψ100,012	
27	Other Costs					
28	1 - Legal / Regulatory Attorney	Document Review / Regulatory	60	\$125.00	\$2,500	\$5,000
29	DTE Consultant	Outside Service	_	,	56,000	, , , , , , , ,
30	Sub-Total				\$58,500	\$5,000
31					, , , , , , , , , , , , , , , , , , , ,	,
32	Regulatory					
33	1 - Regulatory Analyst	Regulatory / Compliance filings	8	\$43.01		\$344
34	1 - Regulatory Processing Tech	TRACS Filing	4	\$28.68		115
35	1 - Team Leader - Market Pricing	Market Pricing - Rate Changes	16	\$50.18		803
36	1 - Senior Equipment Operator	Reproduction	8	\$37.28		<u>298</u>
37	Sub-Total					\$1,560
38						
39	Total				\$166,083	\$31,207

<sup>\*</sup> Note: Costs have been derived based upon year 2003 data extrapolated to reflect 4 solicitations per year.